



Ms. Barbara Wu Heyman
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250 1st St, Suite 1401
Los Angeles, CA 90012

Date: December 15, 2025

Subject: Desktop Review of Potential Biological Impacts for Centennial High School Reconstruction Project and Recommendations for Project Design Features

Dear Ms. Heyman,

As discussed, I have conducted a desktop review of potential biological impacts associated with the Compton Unified School District's Centennial High School Reconstruction Project. This review is based on provided project documents (including the tree inventory report and site layout), database queries (CNDDDB, USFWS Critical Habitat Portal, National Wetlands Inventory), and habitat assessments for the approximately 35-acre urbanized site. The analysis focuses on special-status species, habitats, wetlands, wildlife movement, and compliance with relevant regulations (e.g., CEQA, MBTA, CFGC, and CDFW guidelines).

Key findings from the review:

- The site is fully developed and disturbed, with no sensitive plant species, riparian habitats, sensitive natural communities, or designated critical habitat. No on-site wetlands are present, and indirect impacts to adjacent Compton Creek are de minimis with stormwater controls.
- No suitable habitat exists for listed endangered, rare, or threatened species tracked by CDFW; however, limited potential occurs for Species of Special Concern (SSC) bat species due to possible roosting in buildings/trees and foraging in open areas.
- Tree removal (65 ornamental, non-native trees) and building demolition may affect nesting birds/raptors protected under the MBTA and CFGC §§ 3503, 3503.5, and 3513, or roosting bats.
- The site lacks wildlife corridors or nursery sites, and no conflicts with habitat conservation plans or local ordinances (beyond street tree replacement).

Overall, potential biological impacts are less than significant with incorporation of the following recommended Project Design Features (PDFs):

PDF-BIO-1 Nesting Bird Avoidance. To avoid disturbance of nesting birds, including raptorial species protected by the MBTA and CFGC, activities related to the project, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 31). If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of construction activities. The nesting bird pre-construction survey shall be conducted on foot inside the project site, including a 100-foot



buffer, and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California.

If nests are found, an avoidance buffer shall be demarcated by a qualified biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No parking, storage of materials, or construction activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.

A survey report by the qualified biologist documenting and verifying compliance with this measure and with applicable state and federal regulations protecting nesting birds shall be submitted to the District. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nests to ensure that no inadvertent impacts on the nests would occur.

PDF-BIO-2 Bat Avoidance. To avoid disturbance of roosting bats protected as CDFW Species of Special Concern, activities related to the project, including but not limited to tree removal, building demolition, and construction, shall occur outside of the bat maternity season (typically April 1 through August 31) to the extent feasible. If such activities must occur during the maternity season, a pre-construction bat habitat assessment and survey shall be conducted no more than 14 days prior to initiation of activities. The survey shall be conducted by a qualified bat biologist and include visual inspections of trees and buildings for signs of bat use (e.g., guano, staining, individuals, or colonies). The survey shall cover the project site and a 50-foot buffer where accessible.

If evidence of bat roosting is found, an avoidance buffer (typically 100-300 feet, depending on species and roost type) shall be demarcated by the qualified biologist. All construction personnel shall be notified of the buffer zone and instructed to avoid it until the biologist confirms the roost is vacated (e.g., after pups have fledged or through humane exclusion methods if approved by CDFW). Encroachment into the buffer shall occur only at the discretion of the qualified biologist and in consultation with CDFW if SSC bats are present. Humane exclusion, if necessary, shall be conducted outside the maternity season and in accordance with CDFW guidelines.

Additionally, the Potential for Occurrence Table for special-status species and supporting citations is included as reference. Thank you for your continued collaboration on this project.

A handwritten signature in black ink, appearing to read 'Travis Kegel'.

Travis Kegel

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**Attachment 1:
Potential for Occurrence Table**

Plants

Species Name	Status (Federal/State/ CDFW)	Primary Habitat Requirements	Potential in Site Habitats	Rationale
Coastal dunes milk-vetch (<i>Astragalus tener var. titi</i>)	Endangered/Endangered/-	Coastal dunes and sandy soils.	None	No dune habitat or natural soils.
Coulter's saltbush (<i>Atriplex coulteri</i>)	None/None/- (CRPR 1B.2)	Coastal bluff scrub, coastal dunes, or alkaline soils.	None	No suitable soils or scrub habitat.
Lewis' evening-primrose (<i>Camissoniopsis lewisii</i>)	None/None/- (CRPR 3)	Sandy soils in coastal scrub or openings.	None	No sandy or native soils.
Southern tarplant (<i>Centromadia parryi ssp. australis</i>)	None/None/- (CRPR 1B.1)	Alkaline soils in grasslands or vernal pools.	None	No alkaline or grassland habitats.
San Diego button-celery (<i>Eryngium aristulatum var. parishii</i>)	Endangered/Endangered/- (CRPR 1B.1)	Vernal pools and mesic areas.	None	No vernal pools or wet areas.
Vernal barley (<i>Hordeum intercedens</i>)	None/None/- (CRPR 3.2)	Vernal pools and mesic grasslands.	None	No vernal pools.
Coulter's goldfields (<i>Lasthenia glabrata ssp. coulteri</i>)	None/None/- (CRPR 1B.1)	Vernal pools and alkaline flats.	None	No vernal pools or suitable soils.
Spreading navarretia (<i>Navarretia fossalis</i>)	Threatened/None/- (CRPR 1B.1)	Vernal pools.	None	No vernal pools.



Species Name	Status (Federal/State/ CDFW)	Primary Habitat Requirements	Potential in Site Habitats	Rationale
Prostrate vernal pool navarretia (<i>Navarretia prostrata</i>)	None/None/- (CRPR 1B.2)	Vernal pools.	None	No vernal pools.
California Orcutt grass (<i>Orcuttia californica</i>)	Endangered/ Endangered/- (CRPR 1B.1)	Vernal pools.	None	No vernal pools.
Brand's star phacelia (<i>Phacelia stellaris</i>)	None/None/- (CRPR 1B.1)	Coastal dunes and scrub.	None	No dune or scrub habitat.
Salt spring checkerbloom (<i>Sidalcea neomexicana</i>)	None/None/- (CRPR 2B.2)	Alkaline springs and marshes.	None	No springs or marshes.

Invertebrates

Species Name	Status (Federal/ State/ CDFW)	Primary Habitat Requirements	Potential in Site Habitats	Rationale
Crotch's bumble bee (<i>Bombus crotchii</i>)	None/ Candidate/-	Open grasslands and scrub with flowering plants.	Low	Ornamental landscaping may provide some nectar sources, but limited flowering plants and no nesting habitat in disturbed urban site.
American bumble bee (<i>Bombus pensylvanicus</i>)	None/None/-	Grasslands and open areas with flowers.	Low	Ornamental plants may offer limited nectar; possible foraging, but no suitable nesting.
Belkin's dune tabanid fly (<i>Brennania belkini</i>)	None/None/-	Coastal dunes.	None	No dune habitat.
El Segundo flower-loving fly (<i>Rhaphiomidas terminatus terminatus</i>)	None/None/-	El Segundo dunes with host plants.	None	No dune habitat.
San Gabriel chestnut (mollusk) (<i>Glyptostoma gabrielense</i>)	None/None/-	Freshwater streams	None	No natural freshwater habitat.
Western ridged mussel (<i>Gonidea angulata</i>)	None/None/-	Perennial rivers and streams.	None	No perennial natural stream.



Vertebrates

Species Name	Status (Federal/State/CDFW)	Primary Habitat Requirements	Potential in Site Habitats	Rationale
Amphibians				
Western spadefoot (<i>Spea hammondi</i>)	Proposed Threatened/None/SSC	Vernal pools for breeding; upland grasslands.	None	No pools or uplands.
Reptiles				
Southern California legless lizard (<i>Anniella stebbinsi</i>)	None/None/SSC	Sandy or loose soils in coastal scrub, chaparral, or dunes with moisture.	None	No sandy soils or native vegetation; entirely disturbed and paved.
Coast horned lizard (<i>Phrynosoma blainvillii</i>)	None/None/SSC	Open coastal scrub or chaparral with sandy soils.	None	No native vegetation or soils.
South coast gartersnake (<i>Thamnophis sirtalis pop. 1</i>)	None/None/SSC	Wetlands and streams with vegetation.	None	No natural wetland or stream habitat.
Birds				
Sharp-shinned hawk (<i>Accipiter striatus</i>) (nesting protection)	None/None/WL	Forests and woodlands for nesting; forages in various habitats.	None (foraging only)	Mature ornamental trees may provide limited perching; occasional foraging flyovers possible in urban areas, but no nesting habitat.

Species Name	Status (Federal/State/CDFW)	Primary Habitat Requirements	Potential in Site Habitats	Rationale
Tricolored blackbird (<i>Agelaius tricolor</i>) (nesting protection)	None/Threatened/SSC	Marshes, wetlands, and dense cattails for colonial nesting.	None	No wetland or marsh habitat; ornamental areas insufficient for colonial nesting.
Grasshopper sparrow (<i>Ammodramus savannarum</i>) (nesting protection)	None/None/SSC	Open grasslands and prairies.	None	No grassland habitat; site fully developed with no open fields suitable for ground nesting.
Golden eagle (<i>Aquila chrysaetos</i>) (nesting protection)	None/None/FP, WL	Open areas with cliffs or large trees for nesting; forages over open terrain.	None (foraging only)	Mature trees insufficient for nesting; possible rare foraging flyovers in urban airspace.
Cooper's hawk (<i>Accipiter cooperii</i>) (nesting protection)	None/None/WL	Woodlands and forests for nesting.	Moderate (nesting and foraging)	Mature ornamental trees may provide suitable nesting sites; common nester/forager in urban parks and campuses with trees.
Burrowing owl (<i>Athene cunicularia</i>)	None/Candidate/SSC	Open grasslands with burrows (often ground squirrel).	None	No open ground or burrows; fully developed site with no suitable

Species Name	Status (Federal/State/ CDFW)	Primary Habitat Requirements	Potential in Site Habitats	Rationale
(year-round protection as SSC)				foraging or burrowing areas.
Western yellow-billed cuckoo (<i>Coccyzus americanus occidentalis</i>) (nesting protection)	Threatened/ Endangered/-	Riparian woodlands with dense cottonwoods/willows.	None	No riparian habitat; creek channelized.
Snowy egret (<i>Egretta thula</i>) (nesting protection)	None/None/-	Wetlands and marshes for foraging/nesting.	None	No wetland habitat.
Southwestern willow flycatcher (<i>Empidonax traillii extimus</i>) (nesting protection)	Endangered/ Endangered/-	Dense riparian willow thickets.	None	No riparian vegetation.
California horned lark (<i>Eremophila alpestris actia</i>) (nesting protection)	None/None/WL	Open fields and grasslands.	None	No open ground.
American peregrine falcon (<i>Falco peregrinus anatum</i>) (nesting protection)	Delisted/ Delisted/-	Cliffs or tall structures for nesting; open areas for hunting.	None (foraging only)	Possible perching on buildings; occasional foraging flyovers in urban settings, but no suitable nesting.



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Species Name	Status (Federal/State/ CDFW)	Primary Habitat Requirements	Potential in Site Habitats	Rationale
Black-crowned night heron (<i>Nycticorax nycticorax</i>) (nesting protection)	None/None/-	Wetlands with trees for rookeries.	None	No wetland foraging or rookery habitat.
Coastal California gnatcatcher (<i>Polioptila californica californica</i>) (nesting protection)	Threatened/None/SSC	Coastal sage scrub.	None	No sage scrub habitat.
Yellow warbler (<i>Setophaga petechia</i>) (nesting protection)	None/None/SSC	Riparian thickets for nesting.	None	No riparian habitat.
Brewer's sparrow (<i>Spizella breweri</i>) (nesting protection)	None/None/-	Sagebrush and open shrublands.	None	No shrubland habitat.
Least Bell's vireo (<i>Vireo bellii pusillus</i>) (nesting protection)	Endangered/Endangered/-	Dense riparian willow thickets.	None	No riparian vegetation.
Mammals				
Western mastiff bat (<i>Eumops perotis californicus</i>)	None/None/SSC	Roosts in cliffs, buildings, or trees; forages over open areas.	Moderate (roosting and foraging)	Mature trees or buildings may provide roost sites; foraging common over urban areas at night.

Species Name	Status (Federal/State/CDFW)	Primary Habitat Requirements	Potential in Site Habitats	Rationale
Silver-haired bat (<i>Lasionycteris noctivagans</i>)	None/None/-	Forests for roosting; forages over water/edges.	Low (foraging only)	Limited tree roosting; possible nighttime foraging, but no forest habitat.
South coast marsh vole (<i>Microtus californicus stephensi</i>)	None/None/SSC	Coastal marshes and wetlands.	None	No marsh habitat.
Cave myotis (<i>Myotis velifer</i>)	None/None/SSC	Caves or building roosts; forages near water.	Low (roosting and foraging)	Buildings may provide roosts; limited foraging opportunities.
Pocketed free-tailed bat (<i>Nyctinomops femorosaccus</i>)	None/None/SSC	Roosts in crevices/cliffs/buildings; arid open areas.	Moderate (roosting and foraging)	Buildings may offer roosts; foraging in open urban airspace.
American badger (<i>Taxidea taxus</i>)	None/None/SSC	Open grasslands for burrowing.	None	No open ground for burrows.

